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September 29, 2008

The Honorable Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Ms. Karen Majcher
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

RE: Certification of Federal High Cost Support for Wyoming's Non-Rural Local Exchange Carriers and Eligible Telecommunications Carriers (ETCs) Serving Lines in the Areas of Non-Rural Local Exchange Carriers Pursuant to 47 C.F.R. § 54.313 (CC Docket No. 96-45)

Dear Secretary Dortch and Ms. Majcher:

The Wyoming Public Service Commission (WyPSC) hereby submits, pursuant to 47 C.F.R. § 54.313, its annual certification to the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC). 47 C.F.R. § 54.313 requires the appropriate state regulatory authority to annually certify those non-rural incumbent local exchange carriers and eligible telecommunications carriers serving lines in the areas of non-rural incumbent local exchange carriers within their jurisdiction for purposes of receiving federal universal service support.

For the 2008 annual certification process, the WyPSC applied the requirements and guidelines of WyPSC Rule Section 514 to the ETCs in Wyoming jurisdictional to it. The annual reporting requirements and guidelines contained in WyPSC Rule Section 514 were modeled after the FCC's *ETC Report and Order* adopted February 25, 2005, in CC Docket 96-45, FCC 05-46 and the WyPSC's own annual certification processes and rulemaking proceedings conducted during 2004, 2005 and 2006 for Wyoming's ETCs. The annual reporting requirements for previously designated ETCs in Wyoming became effective August 17, 2006.

Attached to this submission is a letter (PSC Letter Number 08-152) that staff of the WyPSC sent to each ETC subject to its jurisdiction for 2008. This letter and its attachments describe the requirements and responsibilities placed upon the WyPSC in

conducting the annual certification process for each previously designated ETC serving designated areas within Wyoming. Rule Section 514 gives each carrier the opportunity to verify that it continues to offer the nine supported services and functionalities required for designation as an ETC under the federal Telecommunications Act of 1996 and the Code of Federal Regulations, throughout its designated service areas within Wyoming. The WyPSC has also obtained from its jurisdictional non-rural incumbent local exchange carriers and ETCs serving lines in the areas of non-rural incumbent local exchange carriers their respective signed affidavits setting forth how federal universal service support funds have been used, and how they will be used during the applicable 12-month period for which support funds are being requested. Additionally, the data provided by each applicant was the subject of hearings before the WyPSC. The respective affidavits, additional documentation and detailed support from each ETC jurisdictional to the WyPSC will be made available to you upon request.

As the state regulatory authority with jurisdiction to regulate, *inter alia*, the intrastate activities of telecommunications companies serving in Wyoming, the WyPSC hereby certifies the following non-rural incumbent local exchange carriers and ETCs serving lines in the service areas of non-rural incumbent local exchange carriers as being eligible to receive federal universal service support funds for the upcoming program year:


Carrier	Study Area Code
Advanced Communications Technology	519004
Qwest Corporation	515108
Silver Star Communications	519001
Union Telephone Company d/b/a Union Cellular	519905
VCI Company (Lifeline and Linkup Programs only)	519006
Alltel Communications (formerly Western Wireless)	519002
Alltel Communications (formerly Western Wireless)	519007


The WyPSC finds these certifications to be in the public interest.


Western Wireless (WWC Holding Company), now known as Alltel Communications, was previously designated by the FCC as an ETC in certain non-rural service areas of Qwest Corporation within Wyoming in the FCC's *Memorandum Opinion and Order* in CC Docket 96-45, DA 00-2896, adopted December 22, 2000. ETC status was granted to Western Wireless by the FCC in that proceeding (SAC 519002) because the WyPSC did not, at that time, have the requisite authority to grant ETC status to wireless providers. The WyPSC now has the statutory authority to designate wireless providers as ETCs and did so during 2005 in the case of the petition filed by Western Wireless for ETC designation by the WyPSC (SAC 519007) in additional non-rural service areas of Qwest Corporation in Wyoming – the Cody and Powell, Wyoming exchanges (wire centers).

Based upon the representations in the affidavits submitted by these carriers, the review and examination of the additional documentation and support required by WyPSC Rule Section 514 to be filed by carriers and the WyPSC staff analysis, the WyPSC certifies that the above-identified carriers will use the federal universal service support funds only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 214(e) and the requirements and mandates of Part 54 of the Code of Federal Regulations. This includes all elements and components of High Cost Model (HCM) support. Based on the affidavit and other documentation filed by VCI Company, VCI only utilizes its designation as an ETC to participate in federal low income support programs (Lifeline and Linkup). VCI does not seek or receive federal high cost support with respect to its operations in Wyoming.

Sincerely,


KATHLEEN A. LEWIS, Chairman


STEVE OXLEY, Deputy Chairman


MARY BYRNES, Commissioner